

# Exhibit A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
DEJA BARBOUR, SHINNEL GONZALEZ, and 07 Civ. 3014 (RPP)  
RAKAYYAH MASSEY,

Plaintiffs,

**RULE 68 OFFER  
OF JUDGMENT**

-against-

THE CITY OF WHITE PLAINS, MARK  
BURNETT, ANTHONY CARRA, KEVIN  
CHRISTOPHER, ANTHONY FARRELLY, JOHN  
HEFFNER, LAVALLE LARRIER, GILBERT  
LOPEZ, ANTONIO NOLLETTI, and JOHN  
and JANE DOES,

Defendants.  
-----X

The Defendants, THE CITY OF WHITE PLAINS, MARK BURNETT, ANTHONY CARRA, KEVIKN CHRISTOPER, ANTHONY FARRELLY, JOHN HEFFNER, LAVALLE LARRIER, GILBERT LOPEZ, and ANTONIO NOLLETTI, by their attorneys, JOSEPH A. MARIA, P.C., hereby offer, specifically, to the plaintiff **DEJA BARBOUR** the total sum of TEN THOUSAND DOLLARS AND 00/100 (\$10,000.00) for the settlement of all claims pending against the defendants in this action.

This offer is being made at least eleven (11) days before the beginning of the Trial.

The consequences of non acceptance of this offer are clearly set forth in Federal Rules of Civil Procedure 68.

The consequences of non acceptance of the offer under Rule 68 depend upon the outcome of the litigation. Once final Judgment is entered, if the party that did not accept the offer has won a Judgment greater than the amount in the Offer of Judgment, the refusal of the offer has no

consequences whatsoever.

If, however, the non accepting party receives a favorable final Judgment, but for less than the amount of the Offer of the Judgment - Rule 68 requires the non accepting party to pay the offering parties costs incurred after the offer was made.


It is specifically stated at this time that the defendants intend to make a request of the Court, if the defendants are successful upon the Trial of this case for all costs incurred, both actual and legal costs in this matter.

The Offer of Judgment is in the total sum of TEN THOUSAND DOLLARS AND 00/100 (\$10,000.00) and must be responded to in accordance with Rule 68 of the Federal Rules of Civil Procedure.

Dated: White Plains, New York  
March 1, 2011

Yours, etc.

JOSEPH A. MARIA, P.C.

By:   
Joseph A. Maria (0209)  
Attorneys for Defendants  
301 Old Tarrytown Road  
White Plains, New York 10603  
(914) 684-0333  
File No. 33-0725(dj)

TO:

Michael L. Spiegel, Esq.  
111 Broadway, Suite 1305  
New York, New York 10006  
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(f) (212) 571-7767  
(e) [mikespieg@aol.com](mailto:mikespieg@aol.com)


Scott A. Korenbaum, Esq.  
111 Broadway, Suite 1305  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEJA BARBOUR, SHINNEL GONZALEZ,	)	
and RAKAYYAH MASSEY,	)	
	)	<b>NOTICE OF ACCEPTANCE</b>
	)	<b>OF RULE 68 OFFER</b>
Plaintiffs,	)	<b>OF JUDGMENT</b>
	)	
-against-	)	
	)	<b>07 Civ. 3014 (RPP)</b>
THE CITY OF WHITE PLAINS, et al.,	)	
	)	
Defendants.	)	
-----X		

Notice is hereby given, pursuant to Rule 68 of the Federal Rules of Civil Procedure, that plaintiff DEJA BARBOUR hereby accepts Defendants' March 1, 2011, Rule 68 Offer of Judgment.

Dated: New York, New York  
March 3, 2011

  
\_\_\_\_\_  
Michael L. Spiegel, Esq.  
111 Broadway, Suite 1305  
New York, NY 10006  
(212)587-8558  
*Attorney for Plaintiffs*

  
\_\_\_\_\_  
Deja Barbour  
*Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEJA BARBOUR, SHINNEL GONZALEZ, and  
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07 Civ. 3014 (RPP)

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It is specifically stated at this time that the defendants intend to make a request of the Court, if the defendants are successful upon the Trial of this case for all costs incurred, both actual and legal costs in this matter.

The Offer of Judgment is in the total sum of TEN THOUSAND DOLLARS AND 00/100 (\$10,000.00) and must be responded to in accordance with Rule 68 of the Federal Rules of Civil Procedure.

Dated: White Plains, New York  
March 1, 2011

Yours, etc.

JOSEPH A. MARIA, P.C.

By:   
Joseph A. Maria (0209)  
Attorneys for Defendants  
301 Old Tarrytown Road  
White Plains, New York 10603  
(914) 684-0333  
File No. 33-0725(dj)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEJA BARBOUR, SHINNEL GONZALEZ,  
and RAKAYYAH MASSEY,

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-against-

THE CITY OF WHITE PLAINS, et al.,

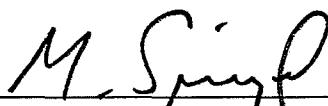
Defendants.  
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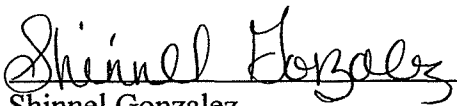
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) **OF RULE 68 OFFER**  
) **OF JUDGMENT**  
)

) **07 Civ. 3014 (RPP)**  
)  
)  
)

Notice is hereby given, pursuant to Rule 68 of the Federal Rules of Civil Procedure, that plaintiff SHINNEL GONZALEZ hereby accepts Defendants' March 1, 2011, Rule 68 Offer of Judgment.

Dated: New York, New York  
March 3, 2011

  
\_\_\_\_\_  
Michael L. Spiegel, Esq.  
111 Broadway, Suite 1305  
New York, NY 10006  
(212)587-8558  
*Attorney for Plaintiffs*

  
\_\_\_\_\_  
Shinnel Gonzalez  
*Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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07 Civ. 3014 (RPP)

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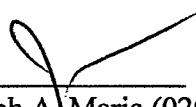
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The Offer of Judgment is in the total sum of TEN THOUSAND DOLLARS AND 00/100 (\$10,000.00) and must be responded to in accordance with Rule 68 of the Federal Rules of Civil Procedure.

Dated: White Plains, New York  
March 1, 2011

Yours, etc.

JOSEPH A. MARIA, P.C.

By:   
Joseph A. Maria (0209)  
Attorneys for Defendants  
301 Old Tarrytown Road  
White Plains, New York 10603  
(914) 684-0333  
File No. 33-0725(dj)

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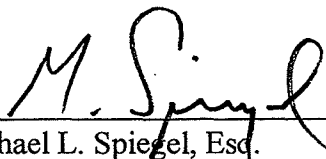
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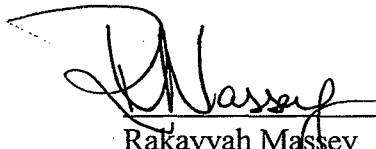
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	)	
-against-	)	
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THE CITY OF WHITE PLAINS, et al.,	)	
	)	
Defendants.	)	
-----X		

Notice is hereby given, pursuant to Rule 68 of the Federal Rules of Civil Procedure, that plaintiff RAKAYYAH MASSEY hereby accepts Defendants' March 1, 2011, Rule 68 Offer of Judgment.

Dated: New York, New York  
March 3, 2011

  
\_\_\_\_\_  
Michael L. Spiegel, Esq.  
111 Broadway, Suite 1305  
New York, NY 10006  
(212)587-8558  
*Attorney for Plaintiffs*

  
\_\_\_\_\_  
Rakayyah Massey  
*Plaintiff*

# Exhibit B

**Michael L. Spiegel**  
Attorney at Law  
**111 Broadway, Suite 1305**  
**New York, New York 10006**

**Tel:(212)587-8558**  
**Fax:(212)571-7767**

Deja Barbour (DB)  
Shinnel Gonzalez (SG)  
Rakayyah Massey (RM)

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STATEMENT OF ACCOUNT AND ACTIVITY

<u>Date</u>	<u>Time</u>	<u>Activity</u>
042006	.7	Initial telephone consultation with DB.
042806	.4	Call with DB.
050306	.2	Call with client DB.
051106	1.3	Meet with client DB.
051506	.8	Review documents from Sharon Rose, Esq., re. DB.
053006	.2	Call with client DB.
060106	.5	Call with Shinnel Gonzalez.
060906	1.5	Meet with client SG.
061906	.4	Calls with Rakkayyah Massey.
062106	.3	Call with RM.
062706	.3	Call with RM.
063006	.2	Call with SG.
070106	2.0	Meet with RM.
070306	.2	Call with DB.
081406	.1	Call with DB.
091906	.3	Call with RM.

092506	1.1	Meet with John Theodorellis, Esq., criminal defense attorney for RM.
100506	.2	Call with SG re. contact from White Plains City attorney.
100606	.4	Call with client and to Joseph Maria, Esq., re. representation for 50-h hearings.
101006	.2	Call with RM re. 50-h scheduling.
101706	.1	Call to DB.
102406	.3	Call with DB re. 50-h hearing.
102706	.4	Call and write Joseph Maria, Esq., re. adjournment of 50-h hearings.
110106	.1	Call with DB.
110706	.1	Call with DB to find RM.
110906	.2	Call with Maria, Esq., to re-schedule 50-h hearings.
112006	.4	Calls with RM re. 50-h hearing, and letter faxed to her employer.
113006	.6	Locating and calling criminal defense attorneys for Barbour and Gonzalez, to go by their offices to review files.
120306	.9	Read documents from DB's criminal defense attorney's files.
120506	.1	Call from RM confirming our meeting for 50-h tomorrow.
120606	7.9	Meet with RM and DB to prepare for their 50-h hearings, attend 50-h hearings for both, go to scene of incident with clients, meet with criminal defense attorney for SG.
010207	.1	Voicemail for client re. getting me pictures of the Star Diner.
	1.2	Read transcript of RM 50-h hearing.
032707	1.1	Draft complaint.
032907	1.2	Finalize complaint.

042007 .1 Read scheduling order from J. Robinson and have it sent to White Plains Law Dept.

052307 .1 Call to WP Law Dept. to identify an opposing counsel; spoke to attorney there who was going to check to see who had case.

052907 .4 Call to WP Law Dept. re. identifying opposing counsel; they forward me to Gallagher Bassett Services, Inc., and Claims Representative Maria Ricciardi at 800-683-0631 - I get voicemail and leave a detailed message.

053007 .4 Call from Gallagher Bassett, who direct me to Joseph Maria; call Maria's office re. submitting scheduling order; review scheduling order dates.

060107 .4 Call with Maria to complete scheduling order; complete order and ECF it to Court and fax to J. Robinson.

060407 .1 Call to criminal court reporter re. obtaining transcript.

060507 .3 Call and write criminal court reporter about obtaining and paying for transcript.

060807 .1 Call with criminal court reporter re. obtaining transcript.

062207 .1 Call with criminal court reporter re. obtaining transcript.

071207 .1 Call to Joe Maria re. postponing conference with J. Robinson.

071807 .1 Call to Maria's office re. re-scheduling conference and letter required by Court.

071907 1.1 Voicemail left for Joe Maria re. obligation to submit a joint letter to J. Robinson and request to postpone conference date; draft letter to J. Robinson re. postponement of conference and as per Judge's direction re. pre-conference letter and fax letter to Maria with notice that I will submit it reflecting we have not spoken if I do not hear from him.

072007	.4	Re-draft letter to J. Robinson and send it to him and Maria.
072607	2.2	Draft and send Initial Disclosures, Discovery Requests and Stipulation and Protective Order.
082307	3.6	Read and create digest of criminal court transcript.
082407	4.1	Read and create digest of criminal court transcript.
083107	3.3	Read and create digest of criminal court transcript.
091307	4.7	Read and create digest of criminal court transcript.
	.5	Review file and prepare for initial conference with J. Robinson.
091407	3.2	Conference with J. Robinson (we were the next-to-last case called on the calendar).
092807	.2	Call with DB.
102307	.4	Call with Maria's office re. re-scheduling plaintiffs' depositions and fax to his office re. same.
102607	.2	Call with Maria's office re. new date for Barbour deposition, 12/17.
120707	.2	Call with Maria's office re. new date for Barbour deposition, 1/15/08.
122307	.8	Review files and revise and edit discovery responses.
122607	1.6	Prepare responses to defendants' discovery requests; call and email to DB's criminal defense attorney re. info about her other arrest; calls with DB re. her old arrest and to RM re. psychological injury.
122707	1.1	Call with DB; finalize discovery responses and send to Joseph Maria.

122807	.3	Call with DB's criminal defense attorney Sharon Rose to obtain criminal court complaint.
	.4	Prepare Notices of Deposition for all defendants and send to Joseph Maria, P.C.
010308	.3	Call with Joseph Maria, P.C., re. deposition scheduling.
011008	1.3	Review files and 50-h transcript to prepare for DB deposition.
011208	2.2	Review files and 50-h transcript to prepare for DB deposition.
011408	.2	Calls to Maria's office re. deposition tomorrow (no answer, left voicemails that I was appearing tomorrow).
	1.5	Review RM 50-h transcript.
011508	3.0	Travel to Maria's office for DB deposition - they had no attorney or court reporter ready, busted depo.
012108	.5	Review clients' files for medical records and arrange to obtain RM's psych records.
020408	.2	Call from Jenny at Maria's office requesting postponement of defendants' depositions (I consented).
	1.9	Review of status of discovery, call with defendants' counsel Frances Marinelli, Esq., re. scheduling depositions and conducting other discovery and letter to J. Karas; draft letter to J. Karas and send to Marinelli for approval; send final letter to J. Karas requesting extension of fact discovery deadline.
	1.3	Review criminal trial transcript digest to determine which defendants to depose first and start to prepare questions for depositions.
020508	.9	Prepare and send subpoena to West. Cty. D.A. and copy to Maria.



021108	.5	Call and email with Marinelli re. re-scheduling Heffner deposition; process release for RM's psych records; call with DB re. deposition date.
021208	.7	Calls with DB and SG re. their upcoming depositions.
021908	.3	Call to RM re. deposition scheduling and preparation.
022008	.3	Call with Maria's office re. re-scheduling depositions and scheduling other officer defendants.
022608	.3	Calls with client SG to discuss and schedule deposition preparation.
022708	.7	Call with Marinelli re. scheduling defendant depositions and copying criminal trial transcript for defendants, make arrangements to copy file and send invoices to Marinelli for their contribution.
022808	.3	Meet with RM and arrange for deposition preparation meeting.
022908	.5	Calls with Marinelli and J. Karas' chambers re. conference on 3/7/08 (canceled), getting discovery responses from defendants, deposition schedules.
	.1	Email to Marinelli re. getting defendants' discovery responses.
030208	2.0	Meet with SG to prepare for deposition.
	1.1	Prepare for Heffner deposition.
030308	4.3	Prepare for plaintiffs' and defendants' depositions.
030608	.1	Call to Marinelli re. defendants' discovery responses.
030708	.9	Read defendants' discovery responses.
030908	1.8	Prepare for plaintiffs' depositions, calls with each client, read clients' 50-h transcripts.

031008	8.0	Deposition of DB in White Plains; meet with RM to prepare for her deposition.
031208	6.0	Deposition of RM in White Plains.
031308	2.2	Prepare questions for depositions of police defendants.
032008	.3	Call with SG.
032208	1.8	Meet with SG.
032408	5.4	Deposition of SG in White Plains.
032508	1.9	Prepare deposition of Heffner; call with attorney Marinelli re. deposition tomorrow; calls to DB re. speaking with SB and call to JB.
032608	2.9	Prepare for and take Heffner deposition.
032708	.4	Calls with DB re. what happened to SB's car and obtaining copies of tickets for the car from East Post Road; call to JB.
	1.9	Read RM psych records.
033108	1.2	Read criminal court clerk's files.
040208	5.2	Read criminal trial transcript and documents to prepare for five police witness depositions.
040308	1.4	Read criminal trial transcript and documents to prepare for five police witness depositions.
040808	3.9	Prepare for and take depositions of Lt. Christopher and PO Farelly.
040908	3.3	Prepare for and take depositions of PO's Nolletti, Burnett & Larrier.
041508	.1	Call with attorney Marinelli re. protective order and extension of time for discovery.
041608	.3	Call with DB.
041708	1.0	Meet with client RM; read White Plains criminal court files re. JB and SB.

	.3	Draft letter to Judge Karas requesting an extension of the discovery deadline.
041808	.5	Call with Marinelli re. letter to Judge Karas and White Plains' position on settlement; call with Judge Karas' chambers re. faxing letter and finalize letter to Court.
042408	.1	Call to Marinelli re. re-scheduling conference with Karas.
042508	.4	Calls to Marinelli and J. Karas' chambers re. adjourning conference; fax letter to J. Karas.
042908	.1	Call with Marinelli re. postponement of conference with J. Karas.
043008	.2	Conference call with J. Karas' chambers re. re-scheduling of conference, receive call from chambers with new date and time and email that information to Marinelli.
	.6	Read RM employment records.
052008	3.0	Attend case management conference with J. Karas.
052208	1.2	Review files to comply with defendants' new discovery demands; obtain releases for SG medical records at White Plains Hospital.
052308	3.5	Draft response to defendants' discovery requests, legal research re. psychotherapist-patient privilege.
052708	.8	Read DB's employment records file.
052808	.9	Call with Marinelli re. scheduling Aragon and Lopez; discuss identity of Grace Clark (not Jones) (a matron in Pct during processing); finalize and send responses to defendants' discovery requests.
101408	.3	Call with client DB.
110708	.3	Call with client RM.
050509	.3	Call with client DB.
111109	.2	Call with client DB.

011910	.2	Call with client DB.
012010	.1	Read order re. status conference from J. Karas.
012510	1.2	Calls with clients DB, RM and SG re. status conference.
020610	1.6	Review case file in preparation for status conference with J. Karas.
020910	3.0	Appear for status conference with J. Karas (defendants' counsel failed to appear).
021710	1.8	Calls with three clients re. settlement conference; review case file and prepare notes for conference and <i>ex parte</i> letter in advance of conference.
022510	.2	Call with client DB.
030310	.6	Calls with clients and with Maria's office re. settlement conference.
030410	5.0	Settlement conference with clients with MJ Davison.
032510	.3	Calls with Karas' chambers and Maria, then draft and send letter requesting adjournment of conference with Karas.
041210	.2	Call with RM.
041510	.2	Call with DB.
	.6	Calls with Joe Maria's office and with Judge Davison's chambers; prepare and send letter requesting adjournment of continued settlement conference (Maria has no authority yet).
041610	.2	Call with RM.
042710	.2	Call with "John," scheduling clerk with Joe Maria's office; he contacts Maria, who says that White Plains is not making any offer on the case.
042810	.5	Draft and send letter to J. Davison and Maria canceling settlement conference.

	.4	Call with Scott Korenbaum re. coming on as second trial counsel, discuss facts of case with him.
050310	.7	Calls with plaintiffs.
050710	.2	Call with DB.
051310	3.3	Attend conference with J. Karas.
070910	.2	Call to JM's office to see if they filed a pre-motion letter (re. Summary Judgment).
071510	.4	Call with DB; call to JM re. SJ letter.
080310	3.5	Appear at conference with J. Karas.
080610	.3	Call with client RM.
081210	.3	Call with client DB.
092710	.1	Scheduling order issued - JPTO due 10/29/10.
100410	1.0	Meet with Scott Korenbaum to bring him up to speed re. background facts of case, issues re. JPTO and motions in limine, and discuss division of labor for trial preparation and presentation.
100510	1.1	Read case files to prepare JPTO and for trial.
100610	1.4	Read case files to prepare JPTO and for trial.
101410	1.7	Read case files to prepare JPTO and for trial.
101510	1.0	Review case files to prepare JPTO.
102110	.3	Call with client DB.
102610	4.8	Review case file to begin trial preparation and prepare JPTO; revise and edit JPTO and send draft to JM; call JM's office to be sure they know I sent it (voicemail re. sending JPTO and giving the email address I used, asking them to inform me if it is not correct).

102910 .3 Call to JM's office, spoke with Calendar Clerk ("John") who told me all lawyers were out of office in court, I explained that JPTO due today, that I have to get it back from JM in order to make any objections (e.g., to defendants' exhibits) and that I am obligated to write J. Karas to let him know if it isn't submitted - he said he was leaving message on JM's desk where he would be sure to see it.

.2 Call from Marinelli re. JPTO, consent to her request for EOT, read her letter to Karas.

110110 .1 Call to Maria's office re. getting me JPTO.

110210 .1 Call with Maria's office re. receiving JPTO and fact that I am leaving office at 3pm.

110410 2.0 Prepare for and attend conference with KMK.

3.0 Travel time to conference and back.

110910 .5 Meet with SAK re. case preparation.

5.4 Revise JPTO, prepare revised exhibit list and final set of Trial Exhibits; research and object to defendants' witnesses; meet with SAK re. JPTO, exhibits, and in limine motions.

111010 .2 Call with KMK chambers re. whether to file exhibits with JPTO.

.7 Prepare trial folders for each defendant.

.5 Meet with SAK re JPTO and motions in limine.

2.1 Review files to prepare defendants' cross-examinations.

111110 3.3 Review files to prepare defendants' cross-examinations.

111210 3.0 Revise JPTO; meet with DB and SAK to prepare for trial; prepare cross of Heffner.

111510 2.2 Review defendants' version of JPTO and the exhibits sent by Maria's office; revise and edit in limine motions.

111610	.5	Meet with SAK re. RM's physical condition and presentation of her case at trial.
111710	7.5	Meet with SG and SAK; review defendants' exhibits and email Maria re. deficiencies; read Heffner trial & deposition transcripts to prepare his x-exam; start reading Christopher trial transcript.
111810	2.7	Prepare Christopher cross, review exhibits from defendants, read letter from Maria to KMK; call with RM re. surgery and confinement to bed due to high risk pregnancy.
112410	6.3	Prepare Christopher cross, start on Larrier cross.
112910	.5	Listen to CDs of 911 call (& "Dispatch Tapes"); call JM's office to explain that we got two identical CDs of 911 calls, no dispatch tape CDs; request to speak with Fran Marinelli, who relays message that I must speak with JM himself. Also request call-back re. JPTO issues - they take message and say JM will call me back.
113010	.1	Call to Maria's office, told he is on trial, leave message, told that there is no one else to speak to re. case.
120210	.1	Call to Maria's office, left message.
	3.5	Read criminal trial transcript and prepare cross-examination of Farrelly.
	.8	Draft and fax letter to KMK and JM re. so ordering JPTO and referral to Senior Judge panel.
120310	.1	Read Memo Endorsed order re. entry of JPTO.
	2.3	Read deposition and prepare Farrelly cross-examination.
120610	2.2	Read criminal transcript of Burnett and prepare cross-examination.
120710	1.8	Read deposition transcript of Burnett and prepare cross-examination.

010711	2.3	Read trial order from Judge Patterson; call with SAK re. trial preparation; begin work on voir dire, requests to charge; revise and edit in limine motion.
011011	3.3	Read plaintiffs' deposition testimony and start preparing opening.
011111	2.7	Read plaintiffs' deposition testimony.
011211	9.5	Read plaintiffs' depositions, prepare opening, and prepare for trial.
011311	5.5	Trial preparation, prepare cross examinations, opening summation.
011411	6.0	Trial preparation, prepare cross examinations, opening summation.
011511	3.5	Prepare cross of defendant Heffner.
011711	8.8	Prepare cross of defendants Heffner and Christopher and other trial preparation.
011811	8.5	Prepare cross of Farrelly and start on Larrier; read letter from Maria asking for trial adjournment and draft and fax response.
011911	8.2	Prepare crosses of Larrier & Noletti.
012011	4.8	Prepare cross of Burnett and revise Opening and Summation.
012111	2.4	Prepare for and attend final pretrial conference with J. Patterson (oral argument on motions and rulings on same).
020711	.1	Call from "Robert" in J. Patterson's chambers asking for a status report.
020811	.2	Call with Lauren Howard from J. Patterson's chambers asking for a status report; email to Maria asking him to advise re. status.
021711	3.6	Read 50-H and deposition transcripts of plaintiffs to prepare for trial.
022211	1.2	Revise and edit Opening statement and cross of Heffner.



022511	1.6	Revise and edit cross examinations of Farrelly and Larrier.
022811	1.8	Revise and edit cross examinations of Noletti, Burnett, and Christopher; outline Summation.
030111	.3	Call with RM re. her medical condition.
030211	1.4	Receive defendants' Rule 68 Offers and confer with plaintiffs.
	.3	Draft plaintiffs' Notices of Acceptance of Rule 68 Offers.
030311	.8	Meet with DB and SG and obtain their signatures on Rule 68 Acceptances; draft and send letter to Maria with Acceptances and fax same to him.
	.1	Call from Joseph Maria.
	.4	Retrieve paralegal time.
	.3	Obtain National Law Journal survey of billing rates and Laffey Matrix.
	.9	Legal research re. reasonable hourly rate for fee application.
030411	.4	Draft, revise and edit proposed Judgment Pursuant to Rule 68 and transmit to Orders and Judgments Clerk.
	1.4	Start drafting Declaration in Support of Fee Application.
030811	7.4	Draft Declaration in Support of Fee Application, collect exhibits, and start drafting Memorandum of Law.
030911	3.8	Revise and edit Memo of Law and Declaration with exhibits.
031011	2.4	Revise and edit Memo of Law and Declaration with exhibits.
	.1	Call with Alan Levine, Esq., re. obtaining his affidavit in support of fee application.

031111	.1	Call with Jon Moore, Esq., re. obtaining his affidavit in support of fee application.
	1.3	Revise and edit Memorandum of Law and Declaration.
031411	1.0	Finalize Memorandum of Law.
	<b>328.6</b>	<b>TOTAL</b>